



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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November 24, 2021

**Via Electronic Mail ([linda.richenderfer@usdoj.gov](mailto:linda.richenderfer@usdoj.gov))**

Linda Richenderfer  
Trial Attorney  
United States Department of Justice  
Office of the United States Trustee  
J. Caleb Boggs Federal Building  
844 King Street, Suite 2207  
Lockbox 35  
Wilmington, DE 19801

**RE: *In re: LTL Management LLC, 21-30589-MBK (D.N.J.)***

Dear Ms. Richenderfer:

We are writing concerning the above-referenced matter and in response to your November 23, 2021 e-mail regarding an updated or amended Notice of Appointment of a Committee. On October 20, 2021, Motley Rice LLC submitted applications for several of our clients for a position on the Official Talc Committee. A copy of our October 20 submission to the United States Bankruptcy Administrator for the United States Bankruptcy Court, Western District of North Carolina, is attached hereto.

Please be advised that two of our clients, Sue Sommer-Kresse and Betty Johnson as Personal Representative of Henry Johnson, are still interested in and eager to serve on the Committee. Each of the clients can be available for a telephonic interview. Further, to the extent you prefer to conduct in-person interviews, our clients can be available in New Jersey or Delaware at your convenience.

Now that this matter has been transferred to the District of New Jersey, we have another client willing and desirous to serve on the Committee. Shirleeta Ellison is a 69-year old African American ovarian cancer survivor living in Teaneck, New Jersey. Ms. Ellison used Johnson's Baby Powder from the time she was a child when her mother would apply the powder to her body. She continued to use Johnson's Baby Powder, regularly applying it to her body and her genital area, throughout her childhood and into her adult life. As she got older, she use the product less frequently, applying the Johnson's Baby Powder to her underwear and feminine hygiene napkins.

MT. PLEASANT, SC | MORGANTOWN, WV | CHARLESTON, WV | PROVIDENCE, RI | WASHINGTON, DC | CHERRY HILL, NJ  
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Motley Rice LLC, a South Carolina Limited Liability Corporation, engaged in the New Jersey practice of law through  
Motley Rice New Jersey LLC. Esther Berezofsky attorney responsible for New Jersey practice.



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In April 2013, Ms. Ellison was diagnosed with Stage 1C ovarian cancer after undergoing a laparoscopic right oophorectomy. Following surgery, Ms. Ellison underwent six rounds of chemotherapy. Thankfully, Ms. Ellison has been in remission for several years.

Ms. Ellison is the mother of five children and a retired financial analyst. At the time of her diagnosis, she was serving as a substitute teacher. Ms. Ellison can be available for a telephonic interview and can be available in-person in New Jersey or Delaware at your convenience. As an African American woman, Ms. Ellison's participation on the Committee is significant because Johnson & Johnson specifically minorities in its marketing.

Motley Rice has extensive experience representing clients on official tort committees. We will provide support to each of the proposed clients, as needed, and have the capacity to dedicate the necessary resources to seek fair resolution of behalf of *all* talc creditors in this case.

We ask that you consider these applicants for membership on the LTL Management LLC Official Talc Committee. If you have any questions regarding these applicants, please do not hesitate to contact me at (856) 382-4670 or [dlapinski@motleyrice.com](mailto:dlapinski@motleyrice.com). Please also include Joseph F. Rice, Esq. ([jrice@motleyrice.com](mailto:jrice@motleyrice.com)) and John A. Baden IV, Esq. ([jbaden@motleyrice.com](mailto:jbaden@motleyrice.com)) on any correspondence.

Yours truly,

Daniel Lapinski